

Exhibit C

From: AJ Johnson
Sent: Friday, August 22, 2025 3:37 PM
To: Carl Johnson; Alexander Loftus
Cc: Dennis Duffy; Elizabeth Butcher; Christopher C. Pappas
Subject: HMAS/Woodbright - conference summary

Carl and Alex,

Thanks for the time today. On the various topics, we believe we agreed as follows, please confirm:

- 1) You agree that Oct. 3 is acceptable for Defendant's response to the class certification motion. We will draft and send an agreed motion/stipulation and order by next Monday.
- 2) As soon as possible, you will tell the process server to hold off on the subpoena to Plains. Meanwhile, we are going to confirm with the bank if they have the data to verify what we stated in the defense responses about moneys relinquished and matched (see attachments #s 1 and 2). We will advise you of same by September 5. We understand that you reserve the right to re-issue the subpoena as we reserve the right to object to it.
- 3) In your disclosures, you will amend and clarify that Woodbright, Meuret, and Mainini are no longer Plaintiffs in this case. So that we are clear for *ex parte* communication purposes, it would be helpful for you to clarify what capacity/matters you represent these three. To be done by 9/5.
- 4) You will amend your discovery responses (initial disclosures and the two interrogatory responses for Pope and Furniss with verification) to provide a clear and consistent statement of damages methodology, along with your calculated damages amount, in at least as much detail as set forth in your class certification Motion. To be done by 9/5.
- 5) You will amend your discovery responses (the initial disclosures and the two document responses) to identify the documents of Pope and Furniss as to each separate request. As to any other documents produced, you will either identify by document request which other documents correspond to which requests, or you will advise which documents in your production (P_PRODUCTION 00001-1178) are no longer relevant (in other words, the documents relevant to dismissed parties that are

not within the current putative class definition are presumed to be longer relevant). To be done by 9/5.

Regards,

AJ

ANDREA M. JOHNSON

Director

KRCL

Kane Russell Coleman Logan PC

5151 San Felipe Street | Suite 800 | Houston, Texas 77056

Tel 713.425.7433 **Cell** 713.705.3769

krcl.com | krclblogs.com

This email and any attachments are confidential. If you received this email in error, please inform the sender and delete it. Thank you.

